

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

*v.*

\$46,971.01 IN FUNDS SEIZED  
FROM WELLS FARGO BANK  
ACCOUNT XXXXXX3913,

DEFENDANT.

CIVIL ACTION NO.:

**VERIFIED COMPLAINT FOR FORFEITURE**

COMES NOW the United States of America, Plaintiff in the above-styled action, by Kurt R. Erskine, Acting United States Attorney, and Cynthia B. Smith, Assistant United States Attorney, for the Northern District of Georgia, and files this verified Complaint for Forfeiture, showing the Court as follows:

**NATURE OF THE ACTION**

1. On or about May 3, 2021, pursuant to a valid federal seizure warrant, agents with the United States Secret Service ("USSS") seized \$46,971.01 in funds from Wells Fargo Bank account XXXXXX3913 in the name of K-A Solutions, Corp. ("the Defendant Funds").

2. The Defendant Funds were seized from the Wells Fargo Bank branch located at 240 Peachtree Street, NW, Atlanta, Georgia 30303, a place within the jurisdiction of this Court.
3. The Defendant Funds are presently within the jurisdiction of this Court and are being held by the United States Secret Service at a secure location.
4. This Court has jurisdiction over this case pursuant to 28 U.S.C. §§ 1345 and 1355.
5. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1395.

#### **FORFEITURE STATUTES**

6. The Defendant Funds are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) because they are derived from proceeds traceable to violations of 18 U.S.C. §§ 1343 (wire fraud) and 1344 (bank fraud).
7. The Defendant Funds are also subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because they were involved in transactions or attempted transactions in violation of 18 U. S. C. §§1956 and/or 1957.

#### **FACTUAL BACKGROUND**

8. On March 19, 2021, the United States Secret Service ("USSS") received a call from a woman who believed herself to be a victim of a romance scam.

9. The victim resides in Atlanta, Georgia, and has sent approximately \$300,000 in the past year to a person she believed to be her boyfriend (“the boyfriend”) who she met on an internet dating site.
10. The “boyfriend” falsely represented to the victim that he needed funds for various business ventures and medical issues.
11. The victim sent the “boyfriend” money by wiring funds, sending cashier’s checks, and making cash deposits into various bank accounts which he controlled or were controlled by associates.
12. The “boyfriend” provided specific instructions regarding the methods by which the victim was to send the funds and the accounts to which the funds were to be sent.
13. The victim deposited funds into numerous different accounts with different names.
14. The victim deposited the Defendant Funds into Wells Fargo Bank Account #3913 based on fraudulent misrepresentations.

**WELLS FARGO BANK ACCOUNT #XXXXXX3913**

15. On or about December 14, 2020, Wells Fargo Account #3913 was opened in Palmdale, California in the name of K-A Solutions Corp.
16. Ahmad Kakar and Zia Kakar are the signers on the account.

17. On February 1, 2021, the victim went to the Wells Fargo Toco Hills Branch located at 2942 N. Druid Hills Road, NE, Atlanta, GA 30329 and deposited a cashier's check in the amount of \$14,045.33 into the account.
18. In making the deposit, the victim was following instructions given by the "boyfriend."
19. After the deposit, Wells Fargo Account #3913 contained the Defendant Funds at issue here.
20. The Defendant Funds consist of funds which are proceeds traceable to fraud and were involved in money laundering transactions.
21. On May 11, 2021, a seizure warrant was issued by a Magistrate Judge in the United States District Court for the Northern District of Georgia for all funds maintained in Wells Fargo Account XXXXXX3913.
22. The seizure warrant was executed on May 12, 2021 at Wells Fargo Bank at 240 Peachtree Street, NW, Atlanta, Georgia 30303.
23. On or about June 16, 2021, the USSS received a claim from Zia Kakar for the Defendant Funds.

WHEREFORE, Plaintiff prays:

- (1) that the Court forfeit the Defendant Funds to the United States of America;
- (2) that the Court award Plaintiff the costs of this action; and

- (3) that Plaintiff have such other and further relief as the Court deems just and proper under the facts and circumstances of this case.

This 3rd day of September, 2021.

Respectfully submitted,  
Kurt R. Erskine  
Acting United States Attorney

/s/ Cynthia B. Smith  
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**VERIFICATION OF COMPLAINT FOR FORFEITURE**

I, Special Agent Andrew Beeco, have read the Complaint for Forfeiture in this action and state that its contents are true and correct to the best of my knowledge and belief based upon my personal knowledge of the case and upon information obtained from other law enforcement personnel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This 3rd day of September, 2021.

*Andrew Beeco*

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SPECIAL AGENT ANDREW BEECO  
UNITED STATES SECRET SERVICE